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38 UNITED STATES DISTRICT COURT  
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40 NORTHERN DISTRICT OF CALIFORNIA

41 FOX FACTORY, INC.,  
42  
43 Plaintiff,  
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45 v.  
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50 Related Case Nos.  
51 3:16-CV-00506-WHO AND  
52 3:16-CV-03716-WHO

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1 To accommodate the schedule of SRAM's counsel, Plaintiff FOX Factory, Inc. ("FOX  
 2 Factory") and Defendant SRAM, LLC ("SRAM") respectfully stipulate, with the Court's  
 3 permission, to continue certain dates in the Court's case schedule as provided below.

4 In response to the Court's recent Order denying the parties' prior proposed amended  
 5 schedule and directing the parties to further meet and confer (Dkt. 50 in Case 3:16-cv-00506-WHO,  
 6 at 4), counsel further met and conferred and jointly communicated with Ms. Davis by email  
 7 regarding scheduling. The net result is that Ms. Davis has advised that the Court is available for  
 8 tutorial and claim construction hearings on September 22 and 29, 2017, respectively, and these are  
 9 the first dates offered by the Court that are also available to both parties. To accommodate this  
 10 proposed change, and mindful of the Court's requirement that there be at least three months between  
 11 the dispositive motions hearing date and trial (*id.*), the parties respectfully propose the amended case  
 12 schedule below.

13 In view of the proposed continued dates for the tutorial and claim construction hearings, the  
 14 parties' proposal would extend various dates by generally corresponding amounts, including the  
 15 dates for the close of fact discovery and the exchange of expert reports. The parties' proposal would  
 16 allow at least three months between the proposed date for hearings on dispositive motions and the  
 17 first proposed trial date. In light of the proposed revised schedule, the parties also propose that each  
 18 party have an additional week to file the opposition and reply claim construction briefs, which  
 19 briefing would be complete more than three months before the proposed tutorial and claim  
 20 construction hearing dates.

21 More specifically, the parties stipulate and respectfully request that the Court modify the  
 22 following dates in the case schedule as provided below (all other dates in the Court's schedule to  
 23 remain unchanged):

<b>Event</b>	<b>Current Date</b>	<b>Proposed New Date</b>
Deadline to Amend Pleadings	April 21, 2017	July 21, 2017
FOX Factory Opening Claim Construction Brief	April 27, 2017	April 27, 2017 (same)
SRAM Responsive Brief	May 11, 2017	May 18, 2017
FOX Factory Reply Briefs	May 18, 2017	June 1, 2017
Tutorial Hearing	June 2, 2017	September 22, 2017
Claim Construction Hearing	June 9, 2017	September 29, 2017

1	Event	Current Date	Proposed New Date
2	Close of Fact Discovery	September 29, 2017	December 20, 2017
3	Initial Expert Reports (on issues upon which party bears burden of proof)	October 20, 2017	January 25, 2018
4	Rebuttal Expert Reports	November 20, 2017	February 26, 2018
5	Motion for Consolidation	November 21, 2017	January 31, 2018
6	Close of Expert Discovery	December 22, 2017	March 30, 2018
7	Last Day to File Dispositive Motions	January 22, 2018	April 25, 2018
8	Dispositive Motions heard by	February 28, 2018	May 30, 2018
9	Pretrial Conference	April 30, 2018	August 16, 2018, subject to the Court's availability
10	Trial	May 29, 2018 and June 25, 2018	September and October 2018, approximately one month apart and subject to the Court's availability

11  
12 Respectfully submitted,

13 DATED: March 17, 2017

14 SHARTSIS FRIESE LLP

15 By: /s/ Erick C. Howard  
16 Erick C. Howard  
17 Attorneys for Defendant  
18 SRAM, LLC

19 DATED: March 17, 2017

20 FINNEGAN, HENDERSON, FARABOW,  
21 GARRETT & DUNNER, LLP

22 By: /s/ Jeffrey D. Smyth  
23 Jeffrey D. Smyth  
24 Attorneys for Plaintiff  
25 FOX Factory, Inc.

## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, except as modified below:

Pretrial Conference	April 30, 2018	August 13, 2018
Trial	May 29, 2018 and June 25, 2018	<b>September 10, 2018 and November 5, 2018.</b>

Dated: March 22, 2017

  
The Honorable William H. Orrick  
United States District Judge  
Northern District of California